

REMARKS

Claims 1-54 are pending in the application. Claims 1, 23, and 43 are independent. Claims 44-54 are new.

On May 1, 2008, Applicants submitted a response ("the May Response") to the Office Action. On June 10, 2008 the Office mailed a Notice of Non-Compliant Amendment ("the Notice") in reply to the May Response. The Notice objected to amendments to the claims proffered in the May Response, particularly that newly-added claims 44-54 were underlined. Applicants are submitting the present paper to address the Notice.

Objections to the Drawings: The Office Action objects to the drawings because labeled element 50 in the Baggage Claim area in FIG. 3 was mislabeled. Accordingly, Applicants are submitting herewith a corrected drawing sheet for FIG. 3 that changes the mislabeled element from 50 to 58. Applicants are respectfully requesting that the objection to the drawing be withdrawn.

Objections to the Specification: The Office Action points out several minor errors present in the specification as filed. Applicants are submitting herewith a substitute specification (marked version and clean version) that addresses the several minor errors noted by the Office.

The Office Action rejects independent claims 1, 23, and 43 under 35 USC § 103(a) as being unpatentable over U.S. Pat. No. 6,396,535 to Waters (hereinafter "Waters") in view of U.S. Pat. No. 6,757,408 to Houvener (hereinafter "Houvener").

The Office Action asserts in rejecting claim 1 that Waters discloses an apparatus for the analysis of a captured image, the apparatus comprising: an at least one first station; an at least one second station; and an analysis device for comparing the at least one second interaction with the at least one first interaction. Applicants respectfully submit that the Office Action's rejection of claim 1 is misplaced for at least the following two reasons.

First, the Office Action maintains that Waters (camera 101, FIG. 3) discloses at least one first station for capturing at least one first image along a traveler path. However, present claim 1 provides "at least one first station for capturing **audio, video, and data** of at least one first agent-traveler interaction along a traveler path". In contradistinction, Waters' camera 101 only "acquires a sequence of images as a video stream" only. Waters at col. 2, lines 23-24. That is, Waters' camera 101 is a single-function device that is agnostic to audio input. Waters further characterizes the output of camera 101 as a digitized video stream, not a digitized stream having audio, video and other data. Applicants therefore respectfully submit that, in light of present claim 1, Waters has a first deficiency, namely that it does not disclose "at least one first station for capturing audio, video, and data of an at least one first agent-traveler interaction along a traveler path" as required by present claim 1. The Office Action does not cite Waters, either singly or in combination with Houvener, in a way that cures this first apparent deficiency.

Second, in forming the § 103(a) rejection, the Office Action acknowledges that Waters does not disclose, and does not maintain that Waters suggests, "an apparatus for the analysis of a captured interaction associated with a traveler and an agent." Office Action at 4. The Office Action further cites Houvener, at col. 6 lines 5-12, for the purpose of curing this acknowledged deficiency of Waters. Houvener, however, does not disclose or suggest analysis of a captured traveler-agent interaction by comparison to another captured traveler-agent interaction, as required by claim 1. Rather, at the cited col. 6:5-12, Houvener is merely expounding the virtues of person-to-person (i.e. screener and screened person) interaction for the purpose of producing captured data of higher quality. Applicants respectfully submit that Houvener does not remedy the acknowledged deficiency of Waters.

As a result, the combination of Waters and Houvener cited in the Office Action neither discloses nor suggests claim 1. The Office Action's § 103(a) rejection of claim 1 is thus overcome. Passage of claim 1 to allowance is respectfully solicited.

Claims 2-22, and 44 depend from claim 1. By virtue at least of this dependence, Applicants respectfully submit that these distinguish patentably over the cited art either singly or in combination. Applicants respectfully request passage of claims 2-22 and 44 to allowance.

The Office Action states that independent claim 23 "differs from claim 1 only in that the [*sic*] claim 1 is an apparatus claim whereas claim 23 is a method" and forms the § 103 rejection of claim 23 "as previously discussed" with respect to claim 1. Office Action at 9.

As discussed above with regard to claim 1-22, Applicants respectfully submit with respect to claim 23 that there exist at least two deficiencies in Waters. First, Waters does not disclose "at least one first station for capturing audio, video, and data of an at least one first agent-traveler interaction along a traveler path" as required by present claim 23. Second, the Office Action acknowledges that Waters does not disclose, and does not maintain that Waters suggests, "an apparatus for the analysis of a captured interaction associated with a traveler and an agent"; and the Office Action does not remedy this acknowledged deficiency.

As a result, the combination of Waters and Houvener cited in the Office Action neither discloses nor suggests claim 23. The Office Action's § 103(a) rejection of claim 23 is thus overcome. Passage of claim 23 to allowance is respectfully solicited.

Claims 24-42 depend from claim 23. By virtue at least of this dependence, Applicants respectfully submit that these distinguish patentably over the cited art either singly or in combination. Applicants respectfully request passage of claims 24-42 to allowance.

Concerning independent claim 43, the Office Action, as for claim 1, asserts that Waters' video cameras 101-106 capture information at predetermined locations along a traveler path. However, present claim 43 requires "capturing **audio, video, and data** information at predetermined locations along a traveler path. In contradistinction, Waters' camera 101 "acquires a sequence of images as a video stream" only. Waters at col. 2, lines 23-24. That is, Waters' camera 101 is a single-function device that is oblivious to audio and other input. Waters further characterizes the output of camera 101 as a digitized video stream, not a digitized stream having audio, video and other data. Applicants therefore respectfully submit that, in light of present claim 43, Waters has deficiencies, namely that it does not disclose "capturing audio, video, and data information at predetermined locations along a traveler path" as required by present claim 43. The Office Action does not cite Waters, either singly or in combination with Houvener, in a way that cures this deficiency.

The Office Action also asserts that Waters discloses "analyzing the recorded information." First, as described above, Waters does not disclose analysis of **audio, video, and data** information, as required by present claim 43. Second, the cited passages of Waters do not disclose or suggest "analyzing the recorded first and second audio, video, or data information by performing a comparison between the first and second audio, video, or data information, wherein said first and said second predetermined locations are substantially non-overlapping" as required by present claim 43. Waters does not disclose an analytical process of comparison, but rather of integration of camera input, *see, e.g.*, Waters at column 2, lines 30-33 (stereoscopic techniques for generating depth information). Further, such a process of integrating video input for generating depth information is useless for video feeds taken from substantially non-overlapping locations.

As described above, the Office Action relies on Houvener for the proposition of providing an analysis capability that Waters lacks. Applicants still maintain that Houvener is merely expounding the virtues of person-to-person (i.e. screener and screened person) interaction for the purpose of producing captured data of higher quality. Applicants respectfully submit that Houvener as cited in the Office Action is irrelevant to the rejection of claim 43.

As a result, the combination of Waters and Houvener cited in the Office Action neither discloses nor suggests claim 43. The Office Action's § 103(a) rejection of claim 1 is thus overcome. Passage of claim 1 to allowance is respectfully solicited.

The Office Action rejects independent claim 18 under Waters, Houvener, in further view of U.S. Pat. No. 6,507,278 to Brunetti (hereinafter "Brunetti"). The Office Action asserts that "the limitations of claim 1 are taught above, [and] Brunetti discloses the interaction is associated with a baggage item."

As discussed with respect to claim 1, Applicants respectfully submit that the cited combination of Waters and Houvener does not disclose or suggest claim 1, from which claim 18 depends. Further, the Office Action does not maintain that Brunetti teaches or suggests any other features of claim 1. Thus, claim 18 is allowable at least for the reason of its dependence from claim 1 even in view of the combination of Waters, Houvener, and Brunetti.

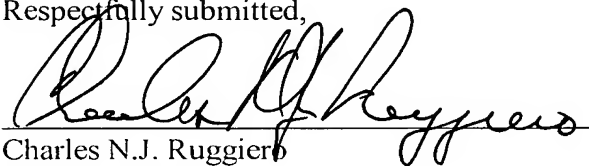
Applicants submit that claim 18 is allowable, and request passage of same to allowance.

Claims 44-54 have been added to point out various aspects of the present application. It is believed that new claims 44-54 are in condition for allowance for at least the reason of their dependence from base claims that are allowable as described above.

Date

July 8, 2008

Respectfully submitted,



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